

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Deno Land Inc.,

Petitioner,

v.

Oracle America, Inc.,

Registrant,

Cancellation No.: 92086835

Mark: JAVASCRIPT

Registration No.: 2416017

**PETITIONER’S FIRST REQUEST FOR THE
PRODUCTION OF DOCUMENTS**

Petitioner Deno Land Inc. (“Petitioner”) services this First Request for Production of Documents on Oracle America, Inc., (“Registrant”) under Rule 34 of the Federal Rules of Civil Procedure and Rule 2.120 of the Trademark Rules of Practice, and request that Registrant responds to these requests within thirty days (30) of service. These requests are intended to be continuing in nature and any information that may be discovered subsequent to the service of the responses should be brought to Petitioner’s attention through supplemental responses within a reasonable time following discussion.

DEFINITIONS AND INSTRUCTIONS

Petitioner incorporates by reference the definitions and instructions set forth in Petitioner’s First Set of Interrogatories.

REQUESTS

1. All documents identified or requested to be identified in Petitioner’s First Set of Interrogatories to Registrant.

2. Documents sufficient to show or identify each product and/or service offered by Registrant in connection with Registrant's Mark, from the date of first use of the mark to the present in the United States.

3. All documents related to Registrant's advertising or written materials, created by Registrant, whether digital or printed, bearing Registrant's Mark.

4. All documents referring to or relating to purchases of any of the products and/or services offered by Registrant bearing Registrant's Mark in the United States.

5. All documents referring to or relating to all judicial and administrative proceedings in any forum referring or relating to Registrant's Mark or any products and/or services offered in connection with Registrant's Marks.

6. Documents sufficient to identify the channels of trade through which Registrant currently markets or has marketed and sells or has sold products in connection with Registrant's Marks in the United States.

7. Documents sufficient to identify the nature, identity, or characteristics of each class or type of purchaser to whom Registrant currently markets/sells, has marketed/has sold, or plans to market/plans to sell to in connection with Registrant's Marks in the United States.

8. Documents relating to Registrant's past, present, and future marketing and advertising of products or services offered by Registrant in connection with Registrant's Mark, including, but not limited to, marketing plans, advertising plans, business plans, and market research reports in the United States.

9. Advertising and promotional materials in each media utilized (e.g., print, radio, television, Internet, billboards) featuring or containing Registrant's Mark in the United

States.

10. Documents sufficient to show Registrant's sales and advertising revenues (by month) from the date of first use of Registrant's Mark to the present for products offered in connection with Registrant's Marks in the United States.

11. Documents sufficient to show the chain of title of Registrant's Mark from first use or filing date, whichever is earlier, to present.

12. Documents sufficient to identify all owners, officers, and employees of Registrant with knowledge of Registrant's use of Registrant's Mark.

13. Documents sufficient to identify all third party use of Registrant's Mark that is not licensed or expressly permitted by Registrant.

14. Documents sufficient to identify every attempt or successful effort by Registrant to enforce its rights in Registrant's Mark against third parties.

15. Documents sufficient to identify every guide, guideline, requirement, or best practice for third party use of Registrant's Mark since the date of first use to present.

16. All agreements entered into by Registrant related to or concerning Registrant's mark, including license agreements, co-existence agreements, consent agreements, and any other contracts that grant permission to third parties to use the JAVASCRIPT mark.

17. All documents in Registrant's possession or control that refer to or relate to Petitioner.

18. All documents in Registrant's possession or control that refer to or relate to third party use of the JAVASCRIPT mark.

19. All documents in Registrant's possession or control that refer to or relate to Ecma

International's TC39 group, including documents sufficient to identify Registrant's role in it.

20. All documents and things relating to the engagement of any witness retained or specially employed to provide expert testimony in this case, including but not limited to the information required in Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure.

21. All documents, including market research, consumer surveys, and internal memoranda by Registrant in connection with the phrase "JAVASCRIPT."

22. All documents showing the exercise of quality control over the goods and services of licensees.

23. All documents related to any periods of non-use of the JAVASCRIPT mark, including any documents explaining the reasons for the non-use.

Respectfully submitted,

Dated: September 6, 2025

A handwritten signature in black ink, appearing to read 'EJP', with a stylized flourish at the end.

Eric J. Perrott, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Petitioner's REQUEST FOR ADMISSIONS is being served by electronic mail on Registrant, as shown in the correspondence record in the Office, as follows:

NADYA C. DAVIS
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Phone: 303-245-2099

Dated: September 6, 2025

A handwritten signature in black ink, appearing to read 'EJP', is positioned above the typed name of Eric J. Perrott.

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